

EXHIBIT C

From: [Hansen, Milli Kanani](#)
To: ["Christopher Geddis"](#); [George T. Williamson](#); [Adam Slater](#)
Cc: [Richard Bernardo](#); ["Rose, Nina"](#); [Kasparie, Alexander J](#)
Subject: RE: [Ext] RE: In re: Valsartan, Losartan, & Irbesartan Products Liability Litigation, MDL No. 2875 (D.N.J.)
Attachments: [image001.jpg](#)
[HGT2028-2009 工艺用DMF国标 2009年至今.pdf](#)
[GBT 23964-2009 工业用三乙胺国标 2009至2023.pdf](#)

Hi Chris –

We did not interpret your request for the certificates of analysis provided by the suppliers of various solvents to include different documents related to the raw materials at issue, including ZHP's raw material inspection reports. As you are aware, these reports do not mention or discuss dimethylamine or triethylamine. Moreover, the parties did not discuss the contents of the inspection reports or include any content from them in the drafts of the various proposed stipulations that we shared with one another. In any event, the inspection reports, which we understand are also maintained in hard copy in China, were not scanned and therefore we are not in a position to produce them.

I have attached the Chemical Industry Standards that set forth specifications for dimethylformamide and triethylamine sold in China to this email. I understand that these specification cover the years 2010 through 2018 and that there are not different applicable versions. I do not presently have a copy of the standard for TEA HCL. My understanding is that these standards did not come from ZHP's files but rather were located online, but I am confirming that and will let you know if I learn anything different.

Milli

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From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Thursday, March 20, 2025 1:28 PM
To: Hansen, Milli Kanani (WAS) <Milli.Hansen@skadden.com>; George T. Williamson <gwilliamson@farr.com>; Adam Slater <ASlater@mazieslater.com>
Cc: Bernardo, Richard T (NYC) <Richard.Bernardo@skadden.com>; 'valpec@kirtlandpackard.com' <valpec@kirtlandpackard.com>; 'valsartan@csdisco.com' <valsartan@csdisco.com>; 'Rose, Nina' <nina.rose@kirkland.com>; Kasparie, Alexander J (CHI) <Alexander.Kasparie@skadden.com>; Liu, Wandy (NYC) <Jun.Liu@skadden.com>
Subject: [Ext] RE: In re: Valsartan, Losartan, & Irbesartan Products Liability Litigation, MDL No. 2875 (D.N.J.)

Counsel,

In continuing to review this production, it appears ZHP did not include its own

internal documents processing the COAs as it did with the COAs produced during our meet and confer. Please produce those internal ZHP documents with the COAs as was done for the documents during our meet and confer immediately.

Thanks,
Chris

Christopher J. Geddis
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From: Hansen, Milli Kanani <Milli.Hansen@skadden.com>

Sent: Monday, March 17, 2025 4:36 PM

To: George T. Williamson <gwilliamson@farr.com>; Adam Slater <ASlater@mazieslater.com>; Christopher Geddis <CGeddis@mazieslater.com>

Cc: Bernardo, Richard T <Richard.Bernardo@skadden.com>; 'valpec@kirtlandpackard.com' <valpec@kirtlandpackard.com>; 'valsartan@csdisco.com' <valsartan@csdisco.com>; 'Rose, Nina' <nina.rose@kirkland.com>; Kasparie, Alexander J <Alexander.Kasparie@skadden.com>; Liu, Wendy <Jun.Liu@skadden.com>

Subject: In re: Valsartan, Losartan, & Irbesartan Products Liability Litigation, MDL No. 2875 (D.N.J.)

Dear Counsel:

We are producing today available certificates of analysis documents and material safety data sheets for dimethylformamide, triethylamine, and triethylamine hydrochloride requested by plaintiffs in their letter dated October 24, 2024. This production is comprised of the following:

VOLUME: ZHP074

BATES RANGES: ZHP03121925 - ZHP03122701

This production is subject to the Discovery Confidentiality Order (ECF No. 139) and is being made available to plaintiffs through the Aquipt document repository. The password for this production is QT8572P6vkFgRcV9. I have attached to this email an updated index that includes information about this production.

Milli

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Further information about the firm, a list of the Partners and their professional qualifications will be provided upon request.

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